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August 20, 2018

Commissioner Brendan Carr  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

*Re: Accelerating Wireless Broadband Deployment by Removing Barriers to  
Infrastructure Investment, WT Docket No. 17-79; Streamlining Deployment of Small  
Cell Infrastructure by Improving Wireless Siting Policies, WT Docket No. 16-421*

Dear Commissioner Carr:

Fast, reliable broadband has the potential to transform rural America. As leaders in rural communities, we are excited about the many benefits that broadband can deliver to our residents. We thus commend the FCC's actions to lower regulatory barriers to broadband investment, and urge that you continue to remove the red tape that impedes broadband's promise.

Broadband, including next-generation wireless technologies, will not only strengthen the economy of rural areas – it will become a lifeline for our nearly 50 million citizens. Next-generation wireless access in schools and homes will allow students to become more connected with the rest of the world. Learning tools enabled by high-speed access will allow students to more fully engage in an immersive learning experience. Farmers and ranchers will be able to use wireless devices to be more efficient and more connected with marketplaces, save resources and energy, lower production costs, and protect against plant diseases or poor growing seasons. And, as other community leaders have noted, broadband will help make our communities more prosperous and more attractive to young individuals, tourists, and new businesses.

Where we serve in Wallowa County, precision agriculture tools are crucial to effectiveness of farming and ranching. As our farmers and ranchers have informed us, in today's agriculture they utilize GPS and wireless datalink technology tools in tractors and other equipment in an effort to be accurate and efficient. For example, data-links can be sent direct from the equipment to the farmer with real-time information on fuel consumption, idle time, gauge readings, etc. that help keep a record of operation uses. Additionally, equipment settings can be adjusted remotely to increase efficiency. With precision agriculture, farmers and ranchers have the ability to participate in soil mapping, fertilizer and seed prescriptions, grazing management plans and many more proactive measures. Having the ability to utilize these tools properly enables them to not only be economically viable, but also environmentally responsible through the most efficient practices.

With the expansive geographic terrain and long distances between irrigated pastures in Wallowa County, farmers and ranchers utilize technology tools such as smartphone apps to control the movement of their irrigation. This increases operation efficiency as there is a reduced need to travel to the long distance locations and manually control irrigation. This decreases both their fuel consumption and required manual labor, ultimately increasing time productivity.

Telehealth services are also crucial in rural communities like Wallowa County, particularly because statistics show that war veterans often relocate to rural communities following their service. This issue is close to home, as Commissioner Todd Nash's son, who is a retired Marine and has been awarded multiple Purple Hearts, relies on access to telehealth services from his home in Wallowa County. It is imperative that veterans in rural areas have access to reliable telecommunications services to access health services that are critically important to their mental health. Many veterans suffer from Post-Traumatic Stress Disorder and telehealth services can provide vital security to their well-being, especially when considering the high rates of suicide among veterans. We encourage the Commission to take actions that will help speed construction of expanded networks to support access to telehealth services.

Despite the many benefits from broadband, the cost of building it in rural areas is very high given the immense amount of land that must be covered: rural America encompasses fully 72 percent of the nation. Wallowa County faces additional challenges related to the influx of tourists during summer months, which can overwhelm broadband networks and render remote irrigation control applications ineffective. Where every dollar matters, reducing regulatory barriers can make a big difference in how fast and how extensively broadband is deployed to our communities. This is why we encourage the FCC to take steps to streamline regulatory processes, which can help rural America reap these benefits sooner. For example, tightening the deadlines for states and localities to approve new network facilities, and limiting government fees charged on such facilities, will promote more investment.

Lowering deployment costs in rural areas by reducing siting fees and regulatory requirements will make investment in new rural infrastructure more economically viable. In addition, similarly decreasing the cost of urban deployment will indirectly promote more rural investment, because the capital that is no longer diverted toward buildout in urban areas is available for investment in rural areas. In short, allowing cities to demand fees without limits harms the FCC's policy objective to foster more broadband in rural areas.

Rural residents have a tremendous amount to gain from the deployment of broadband and next-generation wireless services. We urge the Commission to continue its efforts, and we look forward to working with you to adopt streamlined regulatory processes that will deliver state-of-the-art broadband services across rural America.

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